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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

MEMORANDUM MAR 1986

SUBJECT: Johns-Manville Disposal Area, Comments on Draft Feasibility Study Report

TO: Rodney Gaither, Regional Project Manager

FROM: Babette J. Neuberger, Assistant Regional Counsel

I have reviewed the draft Feasblity Study (FS) report for the Johns-Manville Disposal Site, Waukegan, Illinois, and the Review of the FS Report by PRC. The following comments are noted:

1. Records of Decision for other asbestos disposal sites should be reviewed for consistency of remedy. For example, is a six inch cover with vegetation consistent with selected alternatives at other asbestos sites like Globe, Arizona?

2. I concur with PRC's recommendation that ambient air monitoring should be conducted during the remedial action. EPA should arrange to obtain split samples of air monitors to verify reported results. This was not done during the remedial investigation phase.

3. Johns-Manville proposed to complete implementation of the remedy by December 31, 1988. Is this a reasonable implementation period? The Proposed Implemention Schedule, Table 6-2, incorrectly assumes that a final FS will be prepared after the public notice and comment period. This is incorrect.

4. Another remedial alternative which we may want to require J-M to consider is removal of lead contaminated soils, with soil cover and vegetation over the asbestos materials. Are the lead levels sufficiently high enough, or is there sufficient potential for migration of the lead in the future if the soil alkalinity changes with change in production, to warrant consideration of this alternative?

5. Page 2.1.9 - What is the basis for the statement "Community Perception - This site is perceived as a minimal threat to the environment".

modify this statement

6. Page 2-8, the statement that "fibers longer than 5 micrometers are the ones generally associated with health risk" is inconsistent with the Agency's position that asbestos fibers of all lengths present some degree of health risk. This statement must be deleted or corrected to reflect the Agency's position on the issue.

7. Page 2-14, levels of asbestos in the groundwater and surface water were apparently only reported for fibers greater than 5 microns in length. Did the analytical protocol require quantification of fibers of all lengths? If so, why aren't the levels reported for fibers of less than 5 microns?

all lengths should be reported in report.

8. Page 2-15, the statement "There is no migration of any contaminant from the Site" should be modified to indicate that contaminant migration off-site has not been detected.

9. Page 2-16, are there proposed RMCL's for Drinking Water for asbestos fibers less than 10 microns in length?

Contact Safe Drinking H_2O

10. Page 2-17, were the sub-surface soils below the water table sampled? If not, what is the basis for the statement that sub-surface soil is not a contamination source?

11. Page 3-1, the statement that on-site air quality is not impacted by release of lead or asbestos is incorrect as elevated levels have been detected.

with to PRC

12. Page 3-9, 3-10 what, if any, basis does J-M have for stating that on-site landfilling and on-site stabilization technology are not likely to be accepted by the public?

J-M should limit transportation of waste as much as possible.

13. Page 3-12, 5-2 it is incorrect to state that protection of groundwater is not of concern at the site; it is of concern and that is why we would require grondwater monitoring to ensure that the lead does not migrate. It is also incorrect to state that the lead and asbestos contaminants are encapsulated and in a non-leachable form; these substances may, for the most part, be encapsulated; nevertheless the report indicates elsewhere that there is friable asbestos at the site and that the lead is "not in a readily leachable" form.

PRC concurs that it probably would take about 4 construction seasons to complete. ← asks PRC about this.

14. Page 5-4, is it correct to assume that on-site landfilling would take four construction seasons to complete? KMA should verify their position on this.

15. Page 5-6, do we agree that the most desireable alternative in terms of safety to workers and the community would be the No-Action alternative, particularly in light of the elevated asbestos readings on-site? This statement (KMA's) should be corrected. ✓

16. Page 5-10, what is the basis for the statement that the most favorable alternative in terms of community requirements is soil covering with vegetation? I agree that this is the most favorable alternative. ✓ / Ring and split the PC period, what comm wants.

17. Page 5-15, the statement "There has been no documented increase in the airborne emission of pollutants from the disposal area" is not true. There were elevated asbestos readings. Readings on-site were higher than off-site, but still below any significant levels. ✓

In summation, the draft FS report contains substantial assumptions pertaining to eg. community perceptions, the "non-leachable" form of the lead, and lack of data evidencing asbestos emissions, which are either not supported by fact or directly contradict statements made elsewhere in the document. These inconsistencies and unsupported statements must be corrected. I have only identified several of the many pages where these statements appear.

Has the Illinois EPA been given an opportunity to review the report and supply you with comments?

I look forward to discussing my comments with you. Please call me at 886-6595 to set up a meeting.

cc: Field/ Gade/ Ullrich/ Schaefer

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-6761

Refer to: L09719014 - Lake County
Waukegan - Johns-Manville
Superfund/General Correspondence

March 26, 1986

Rodney Gaither, RPM
USEPA
230 South Dearborn
Chicago, Illinois 60604

Dear Rodney:

I have completed my review of the Draft Feasibility Study for Johns-Manville project. In addition to the comments submitted by PRC I have listed the following as areas of my concern. Please find attached a listing of those comments to be included in your final review.

Sincerely,

Jeff Larson, Project Manager
Federal Site Management Unit
Remedial Project Management
Division of Land Pollution Control

JL:ds:0667F/34

cc: Robert Cowles, IEPA
Gloria Craven - IEPA
Ed Lyn - IEPA - Maywood
Don Gimble - IEPA - Maywood
Dan Caplice - USEPA
Karen Yeates - USEPA
Author
Division File

L0971900014 Lake Co.
Johns-Manville
Superfund/General Correspondence

IEPA COMMENTS FOR JOHNS-MANFILLE FEASIBILITY STUDY
March, 1986

Page 2-1, 2.1.2 SITE HISTORY

A statement implies that there is presently no asbestos being deposited at J.M. This contradicts page 2.5 para. 1 stating that J.M. receives limited quantities of friable asbestos waste.

Page 2-11, 2.2.1 WASTE CHARACTERISTICS AND QUANTITIES

Process Water Sludge. Question - Doesn't the sludge dry out overtime and release asbestos? Also as per quantities the paragraph states that 50% of the 175,000 c.y. of sludge is deposited in a disposal pit and 50,000 c.y. in a settling basin, what about the other 37,500 c.y. of sludge remaining?

Page 4-3, 4.2.1.2 CLEARING AND GRUBBING

I feel that burning of grubbed trees and roots would be better than burying. This eliminates the possibility of soil piping after decomposition.

Page 4-4, 4.2.1.3 GRADING WASTES

Maximum dike slope should be 1:3.

Page 4-4, 4.2.1.5 REVEGETATION WITH GRASS AND SHRUBS

I feel that a spinning disk or drop seeder would be better, with a krimper used to place straw mulch. Should add an annual rye to the seed mix. Everything depends on fill soil pH results for soil amendments. Trees and shrubs should be planted in pits to be excavated and lined with fabric. Trees should have fiberous root systems, not tap roots. (Maybe maples and ash, etc.).

Page 4-5, 4.2.1.6 PLACING RIPRAP ON SETTLING-BASIN

Slopes and Gravel. The limestone riprap should be specified to a large enough type so as not to move, i.e., 8-12" diameter (100-150 pounds) drop method of placement.

The 24" coversoil layer should have an organic content to it, be tested for pH, reserve acidity & alkalinity. Perhaps gravel roadways should have a geotechnical fabric placed on a compacted base, then have the gravel, (Type A) road surface placed and compacted to a 90% density.

Page 4-6, 4.2.1.9 ADDITION

Decontamination of haulage trucks and vehicles. Trucks coming on-site to deposit fill shall be sprayed off on a DECON pad prior to leaving the site. Wash water will be drained to basins on-site.

Page 4-8, 4.4.1.1 WASTE REMOVAL AND HANDLING

Inspection of soils during excavation, to be possibly used as fill material never works as planned. It's not only very costly and troublesome, but causes time delays. Someone is needed to make decisions on-site at all times. You can't always judge a soil by visual inspection of what's clean.

Page 4-9, 4.4.1.1 WASTE REMOVAL AND HANDLING

The USEPA off-site policy will hurt this alternaive as there are no facilities in compliance for CERCLA wastes. Changes may have to occur to the off-site policy. A decision on when compliance must occur during the project, is one example of wording problems. This policy could cost the government thousands of dollars in downtime, remobilization fees, and staff time in negotiations on liquidation penalties.

Page 4-9, 4.4.1.2 REBUILDING OF PROCESS WATER TREATMENT AND SITE GRADING

Wouldn't it be better to build slurry settling impoundments that are deep and not wide and shallow. How about future electrolysis methods in dewatering of slurry impoundments?

Page 4-13, 4.5.1.3 COLLECTION AND TREATMENT OF LEACHATE AND RUNOFF

Leachate Collection system should drain into a catch basin. Leachate Detection system should drain into a separate catch basin.

Page 4-13, 4.5.1.4 PLACING MULTI-LAYERED CAP FOR CLOSURE

The sand from on or off-site to be used for the infiltration layer should be free of sharp objects or stones larger than a fist. The shaped surface of the waste material should also be free of sharp objects which could puncture the synthetic liner.

JL:mgg0691f/24-25